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09:05 AM, 09 Jun, 2025
U.S.D.C., Eastern District of New York

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

Case No.: 1:22-cv-1032 (PKC)(JRC)

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
DECLARATION OF GREGORY ELEFTERAKIS,
ROMAN POLLAK, JONATHON D. WARNER, ESQ.
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

**Opposition To Plaintiffs
Request for Incarceration**

Defendants.
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Dear Judge Chen,

I write to you today with grave concern over the plaintiff's shocking request to incarcerate my husband and me—a demand that is not only legally meritless but morally reprehensible. This is a *civil* matter, yet the plaintiff and her attorneys, having failed to meet their burden of proof, now seek to destroy our family by resorting to threats of imprisonment. We have never violated any law, yet they would rather weaponize the court's authority than admit their case lacks evidence.

From the beginning, this case has been built on lies—lies that are now unraveling. The plaintiff's desperation is evident in her request for extreme sanctions, a transparent attempt to avoid accountability as her falsehoods come to light. The court should see this motion for what it is: a malicious tactic to punish us for defending ourselves against unsubstantiated claims. Her attorneys have repeatedly abused this court's processes, harassing us with frivolous motions and now seeking to incarcerate two parents over a civil dispute. Such tactics reveal their true character: they will stop at nothing to win, even if it means trampling the truth and harming innocent children in the process.

The law does not permit incarceration for unproven civil claims, and this motion should be seen for what it is—an act of intimidation. We urge the court to deny this outrageous request and to hold the plaintiff and her counsel accountable for their misconduct. Enough is enough.

Thank you for your time and consideration.

Sincerely,
Safa Gelardi

Pro Se Litigant